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PHASE I ENVIRONMENTAL SITE ASSESSMENT

York Technical Institute
3050 Hempland Road
Lancaster, Lancaster County, Pennsylvania

Prepared For:

CMS Companies
Wynnewood, Pennsylvania

Prepared By:

Blackstone Consulting LLC
Project No. CMSIPA024.01

February 14, 2007

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EXECUTIVE SUMMARY

Blackstone Consulting LLC (Blackstone) performed a Phase I Environmental Site Assessment (Phase I ESA) of the York Technical Institute (YTI) facility located at 3050 Hempland Road in Lancaster, Lancaster County, Pennsylvania (site). It is understood that the site facility is planned for acquisition. The purpose of the Phase I ESA was to identify recognized environmental conditions (RECs) in accordance with ASTM Standard E 1527-05 and other conditions of environmental concern at the site (ASTM *Non-Scope Considerations*).

SITE INSPECTION

Name of Inspector: Jeff Mt. Pleasant

Date of Inspection: January 29, 2007

Site Representative: Mr. Earl Ludwig, Facility Manager for YTI Lancaster Campus

SITE DESCRIPTION

Street Address: 3050 Hempland Road

City and State: East Hempfield Township, Pennsylvania

County: Lancaster

Legal Description: Parcel Identification Numbers: 290-75820, 290-95687, and 290-08331

Tract No. 1: All that certain lot or tract of land situate on the north side of Hempland Road between Donnerville Road and Centerville Road in East Hempfield Township, Lancaster County, Pennsylvania, and being known as Lot No. 3, as shown on an Alta/ACSM Land Title Survey prepared by Saxinger and Black, Inc. Land Surveyors and Landscape Architects, bearing Job Number 05-337-03, dated September 1, 2005, and being more fully described in Document No. 5463452 in deed records of Lancaster County, Pennsylvania.

Tract No. 2: All that certain five (5) foot strip along the east edge of the larger tract from which this is taken, situate in the Township of East Hempfield, County of Lancaster and Commonwealth of Pennsylvania, being more fully described in Document No. 5463452 in deed records of Lancaster County, Pennsylvania.

Tract No. 3: All that certain lot or tract of land situate on the north side of Hempland Road, west of Centerville Road, in the Township of East Hempfield, County of Lancaster and Commonwealth of Pennsylvania, and being known as Lot No. 9, as shown on an Alta/ACSM Land Title Survey prepared by Saxinger and Black, Inc. Land Surveyors and Landscape Architects, bearing Job Number 05-337-03, dated September 1, 2005, and being more fully described in Document No. 5463452 in deed records of Lancaster County, Pennsylvania.

Owners: York Tech Associates, LP

Property Size: Approximately 7.1 acres

Site Use: The site is occupied by a technical school primarily providing instruction/training for culinary arts, criminal justice, and allied medical service careers. The building is comprised of classrooms, kitchen and restaurant areas, a dental training facility with X-ray equipment, a computer lab, an administrative office area, restrooms, and utility and maintenance storage rooms. The dental training facility consists of dental chairs and mannequins for educational purposes. A receiving area is located at the south side of the building. An exterior storage area is located at the southwest corner of the building. Paved parking areas are located on the north, south, and east sides of the site building. Grassed areas are located further north of the north paved parking lot and on the west side of the site. Landscaping is present throughout the site. Access to the site from Hempland Road is via access drives on the south side of the site.

Year Built: 1973

Structure(s)	<i>Location On Site</i>	<i>Number of Stories</i>	<i>Years(s) Built</i>
<i>Educational training building</i>	Center	1	1973

HISTORICAL INFORMATION

Reasonably ascertainable historical information indicates that the site consisted of undeveloped, residential, and/or agricultural land from at least 1864 until construction of the present-day structure in 1973. Previous uses of the site since 1973 included the following: International Signal & Control Corporation (ISC) electronics manufacturer (1973-1993); and Emtrol, Inc. (1995-2002). YTI has occupied the site since acquisition in 2003.

The adjoining properties consisted of undeveloped, residential, and/or agricultural land from at least 1864 through circa 1970. One of the north adjoining properties (beyond US Route 30) has been a hotel/motel facility since at least 1970. The remaining north adjoining property has been used for agricultural/residential purposes since at

least 1904. Commercial use of the south adjoining properties beyond Hempland Road has consisted of the Purina Mills, Inc. pet food production facility and the Unclaimed Freight Company facility since the early 1980s. Two present day professional office buildings have occupied the east adjoining properties since the early 1990s. The west adjoining property use consisted of the present day Thomas Somerville Company plumbing, heating and air conditioning supplies distribution facility since 1997. Former occupants listed at this west adjoining property included: Novelty Manufacturing (1986-1996), ASM Industries, Inc. pumps and parts (1981-1983), and "Warehouse" (1975-1978).

Blackstone has performed a Phase I ESA of the site in general accordance with ASTM Standard E 1527-05 and the January 2, 2007 proposal (Agreement) between CMS Companies (CMS) and Blackstone. Based on the information obtained during the completion of this Phase I ESA, no recognized environmental conditions (RECs) or other conditions of environmental concern were identified in connection with the site except for the following:

- **Former Manufacturing on Site:** The former site use by ISC from approximately 1973-1993 represents an environmental concern based on the widely recognized use of solvents in the manufacturing and assembly of electronic components. Hazardous waste codes associated with past ISC operations, which include F001, F002, and F003, confirm the use of chlorinated solvents at the site. Documentation regarding past ISC operations and materials handling reviewed at the PADEP also indicate the use of two vapor degreasers in the ISC production lines. Standard vapor degreaser solvents include trichloroethylene (TCE), methylene chloride, and perchloroethylene (perc). These chlorinated solvents readily penetrate concrete floors and can impact underlying soil and groundwater. Based on the duration (20 years) of ISC operations, the recognized use of chlorinated solvents in the electronics manufacturing process, and the time period of operation during the 1970s and early 1980s which pre-dates various hazardous substance/waste reporting, handling, and disposal requirements, the former site use by ISC is considered a REC.

Furthermore, Mr. Howard Bowles (Chief Director of Facilities for YTI) stated that a septic system located along the western side of the site was used when the facility was first constructed in 1973. When the addition along the western side of the building was constructed in 1974, the site was required to connect to the Lancaster Area Sewer Authority (LASA) system. According to LASA customer

service representatives, the site was connected to sanitary sewer service by permit dated August 27, 1974 and inspected/approved on September 4, 1974. Based on this information, the septic system was in use for approximately one year prior to connection to municipal sanitary sewer service. Based on the confirmed use of chlorinated solvents since construction in 1973, the potential to subsurface impact via the former septic system also exists and is considered a REC.

Further investigation in the form of a subsurface soil and groundwater investigation is recommended to evaluate the potential impact from historical site activities.

The following asset management issue was identified at the site:

- **Asbestos-Containing Materials (ACM):** Based on the complete renovation date of the site building except for the administrative area (2003) and scope of work, bulk samples of suspect ACM were not collected. Based on the original construction date of the building (1973), suspect ACM exists in the administrative area. An asbestos Operations and Maintenance (O&M) Plan is recommended to address the suspect ACM.

Prior to demolition or renovation activities at the site, building materials must be handled in accordance with the National Emissions Standards for Hazardous Air Pollutants (NESHAPs), OSHA, and State of Pennsylvania regulations. The limited asbestos visual survey summarized in this Phase I ESA should not be considered an asbestos survey for demolition or renovation purposes.

This section is only intended to represent a brief summary of our findings, and is not a detailed account of all the information provided in this report. The report should be reviewed in its entirety prior to drawing any final conclusions as to potential environmental conditions associated with the site.

1.0 INTRODUCTION

1.1 PURPOSE

Blackstone Consulting LLC (Blackstone) performed a Phase I Environmental Site Assessment (Phase I ESA) of the York Technical Institute (YTI) facility located at 3050 Hempland Road in Lancaster, Lancaster County, Pennsylvania (site). It is understood that the site facility is planned for acquisition.

The purpose of this Phase I ESA is to investigate and identify recognized environmental conditions (RECs) associated with the site and/or surrounding property. The term *recognized environmental conditions*, as defined in the ASTM Standard Practice E 1527-05, includes the following:

The presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis are not recognized environmental conditions.

This practice is intended to permit a “User” to satisfy one of the requirements to qualify for the *innocent landowner, contiguous property owner, or bona fide prospective purchaser* limitations on CERCLA liability; that is, the practice constitutes all appropriate inquiry into the previous ownership and uses of the site consistent with good commercial or customary practice as defined at 42 §U.S.C. 9601(35)(B) and the regulations at 40 CFR Part 312.

Other *conditions of environmental concern* are detailed in Section 1.3 and outlined in the accepted scope of work detailed in the January 2, 2007 proposal (Agreement) between CMS Companies (CMS) and Blackstone.

1.2 SPECIAL TERMS AND CONDITIONS

This Phase I ESA has been conducted in general accordance with ASTM Standard Practice E 1527-05 and the January 2, 2007 Agreement between CMS and Blackstone. Qualifications of the environmental professionals conducting this assessment have been provided previously to CMS in a statement of qualifications package.

Blackstone performed the professional services, obtained findings, rendered conclusions, and prepared recommendations in accordance with generally accepted practices of other environmental consultants undertaking similar assessments at the same time in the same geographical area.

Historical and environmental information pertaining to the site has been included in this report to the extent that such information is *practically reviewable*, as defined in the above-referenced standard practice.

Blackstone reviewed an environmental database search report. Blackstone conclusions based on the search report are limited to the accuracy of that report. To the extent possible, Blackstone field observations are used to verify the information or identify errors and inconsistencies in the search report regarding the listed facilities in the immediate vicinity of the site.

1.3 SCOPE OF SERVICES

As detailed in the accepted Agreement between Blackstone and CMS, this Phase I ESA was conducted in general accordance with industry standards, including the ASTM Standard Practice E 1527-05 and the Agreement. The Phase I ESA presented herein may vary from “guidelines” or “standards” required by organizations other than ASTM. This Phase I ESA included the following services:

1. A site inspection to identify and evaluate potential sources of RECs or other conditions of environmental concern such as underground storage tanks (USTs), aboveground storage tanks (ASTs), equipment containing polychlorinated biphenyls (PCBs), waste and chemical storage areas, and wastewater and storm water discharges. The inspection included observations for evidence of chemical spills, releases, or on-site waste disposal.

2. A review of site records and interviews with site representatives with regard to current and former site operations to identify known or potential environmental concerns.
3. A visual survey of the properties in the vicinity of the site to evaluate the potential for RECs or other conditions of environmental concern at the site from these properties.
4. A review of historical information to identify RECs or other conditions of environmental concern at the site from historic on-site and off-site uses. To the extent feasible under the conditions of the assessment, the historical information obtained included verbal information from site and/or local agency representatives. In addition, some or all of the following records, where *publicly available* and *practically reviewable*, were reviewed: construction plans, zoning maps, building permits, property record cards, topographic maps, fire insurance maps, historical city directories, and aerial photographs.
5. A review of State and Federal environmental database information.

Blackstone also performed the following activities to identify *other conditions of environmental concern* (i.e. ASTM *Non-Scope Considerations* or *Business Environmental Risk Evaluations*) in addition to the ASTM requirements and as required per the Agreement:

1. Determination of site water supply and an appropriate inquiry with municipal drinking water supplier to determine compliance with applicable federal, state, and local regulations.
2. A review of records (USEPA Office of Radiation and Indoor Air Map of Radon Zones) regarding radon concentrations to determine if concentrations of radon in the general area of the site are within the USEPA guidelines.
3. A limited asbestos-containing material (ACM) visual survey (no sampling) focused primarily on friable and damaged nonfriable suspect ACM.
4. A limited visual screening (no sampling) to identify lead-based paint (LBP) on representative interior painted surfaces.
5. Document research, visual survey, and interviews for the presence of wetlands, flood hazards, and air emissions.

The scope of this project did not include subsurface soil or groundwater sampling. Consequently, conclusions provided with regard to subsurface soil and groundwater impacts are limited to those that can be formed based on a non-intrusive investigation. The absence of environmental hazards in the subsurface cannot be guaranteed based on conditions observed on the surface.

The limited ACM and LBP visual surveys are intended to provide an indication of the potential for significant environmental issues associated with these materials. Hidden materials such as those inside walls, inaccessible attics, crawl spaces, and inside ductwork and piping were not evaluated. As such, these surveys should not be regarded as comprehensive surveys for demolition or renovation purposes or indoor air/water quality health risk assessments.

Blackstone has not performed any additional observations, investigations, studies, or other testing not specified in the Agreement between CMS and Blackstone. Blackstone shall not be held liable for the existence of any condition the discovery of which would have required the performance of services not authorized under the Agreement as approved by CMS.

1.4 PROJECT-SPECIFIC LIMITATIONS AND EXCEPTIONS

During the site inspection, inaccessible areas of the site including beneath parked motor vehicles, under manholes, or in areas of extremely dense vegetation were not inspected by Blackstone. There is no reason to believe the inability to inspect these areas would alter the findings or recommendations set forth in this report.

1.5 SIGNIFICANT ASSUMPTIONS

As with any due diligence evaluation, there is a certain degree of dependence upon oral information provided by site or agency representatives that is not readily verifiable through visual inspection or supported by any readily available written documentation.

Blackstone shall not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not otherwise fully disclosed by site or agency representatives at the time this assessment was performed.

Conclusions stated herein are based upon publicly available information and other documented sources. Blackstone has assumed, where reasonable, that the information reviewed is true and accurate. Blackstone assumes no responsibility for inaccurate information that is not otherwise obvious in light of information of which Blackstone has actual knowledge. Blackstone's site observations are of the conditions observed at the time of the assessment. The statements, conclusions, and opinions contained in this report are only intended to give approximations of the environmental conditions at the site.

This report provides an estimation of groundwater flow direction at the site based on visual observations and topographical data. This assessment did not include groundwater sampling and water table elevation measurement. True groundwater flow direction can only be determined through direct measurement of groundwater elevations from properly installed on-site groundwater monitoring wells. The groundwater flow direction estimation should not be considered a true measurement of groundwater flow direction.

1.6 RELIANCE

This report may be relied upon by CMS, and their assigns and legal counsel subject to the terms and conditions of the Agreement between CMS and Blackstone. No other person may rely upon this report without written authorization from Blackstone.

Any use of or reliance upon the information by a party other than that specifically named above shall be solely at the risk of such third party and without legal recourse against Blackstone, its parent or its subsidiaries and affiliates, or their respective employees, officers, or directors, regardless of whether the action in which recovery of damages is sought is based upon contract, tort (including the sole, concurrent or other negligence and strict liability of Blackstone), statute or otherwise. This report shall not be used or relied upon by a party that does not agree to be bound by the above statement.

1.7 PASSAGE OF TIME

This report reflects site conditions observed and described by records available to Blackstone as of the date of report preparation. The passage of time may result in significant changes in site conditions, technology, or economic conditions that could

alter the findings and/or recommendations of this report. Accordingly, Blackstone's client and any other party to whom the report is provided recognize and agree that Blackstone shall bear no liability for deviations from observed conditions or available records due to the passage of time.

2.0 USER PROVIDED INFORMATION

Blackstone has performed this Phase I ESA for CMS. As such, CMS is considered the “User” of the report, as defined under ASTM Standard Practice E 1527-05. In order to qualify for one of the *Landowner Liability Protections (LLPs)* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2002 (the “*Brownfields Amendments*”), the User must provide certain information based on their relationship to the purpose of the due diligence.

As part of this Phase I ESA, Blackstone requested certain information from the “User” (Mr. David Rodgers – Vice President for CMS) and the “Site Representatives” who included Mr. Howard Bowles (Chief Director of Facilities for YTI), and Mr. Earl Ludwig (Facility Manager of YTI Lancaster Campus). The information requested and associated responses are outlined in Section 2.1 through Section 2.6 below.

2.1 REASON FOR PERFORMING THE PHASE I ESA

Blackstone understands that this assessment was performed for CMS as the potential purchaser of the site. As such, this Phase I ESA was conducted in an effort to qualify for the *innocent landowner, contiguous property owner, and bona fide prospective purchaser* defense to CERCLA liability and performed as an appropriate risk management and due diligence standard for real estate transactions in accordance with general industry standards which include ASTM Standard E 1527-05.

2.2 TITLE RECORDS, LIENS, AND PROPERTY USE LIMITATIONS

With reference to environmental cleanup liens that are filed or recorded against a site (40 CFR 312.25), the User and Site Representatives were not aware of any environmental cleanup liens against the site that are filed or recorded under federal, tribal, state, or local law.

With reference to activity and land use limitations (AULs) that are in place on a site or that have been filed or recorded in a registry (40 CFR 312.26), the User and Site Representatives were not aware of any *activity and land use limitations* (AULs), such as *engineering controls*, land use restrictions or *institutional controls* that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state, or local law.

Blackstone also obtained independently certain environmental lien search information (refer to Section 6.5). Review of this information did not indicate evidence of environmental liens associated with the site.

2.3 SPECIALIZED KNOWLEDGE, COMMONLY KNOWN & DEGREE OF OBVIOUSNESS

With reference to specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28), the User and Site Representatives had no specialized knowledge or experience related to the site or nearby properties.

With reference to commonly known or *reasonably ascertainable* information about a site (40 CFR 312.30), the User and Site Representatives were not aware of commonly known or *reasonably ascertainable* information about the site that would help the *environmental professional* to identify conditions indicative of releases or threatened releases, such as:

1. Past uses of the site;
2. Specific chemicals that are present or once were present at the *site*;
3. Spills or other chemical releases that have taken place at the *site*; and
4. Environmental cleanups that have taken place at the site.

With reference to the degree of obviousness of the presence or likely presence of contamination at a site, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31), the User and Site Representatives, based on knowledge and experience related to the site, were not aware of any *obvious* indicators that point to the presence or likely presence of contamination at the site.

Blackstone requested from the Site Representatives any other specialized knowledge regarding the environmental conditions associated with the site. The Site Representatives did not have any specialized knowledge of RECs or other conditions of environmental concern at the site.

2.4 VALUE REDUCTION FOR ENVIRONMENTAL ISSUES

With reference to relationship of the purchase price to the fair market value of a site if it were not contaminated (40 CFR 312.29), the User indicated that, to their knowledge, the

purchase price being paid for the site reasonably reflects the fair market value of the site, and has not been reduced due to contamination known or believed to be present at the site.

2.5 OWNER, KEY SITE MANAGER, AND OCCUPANT INFORMATION

The User and Site Representatives were interviewed regarding environmental conditions at the site. These individuals were not aware of: (1) pending, threatened, or past litigation relevant to environmental conditions on the site; (2) any pending, threatened, or past administrative proceedings relevant to environmental conditions in, on, or from the site; and (3) any notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to environmental conditions on the site.

As the property has been used for technical school training since 2003, the former facility manager (Mr. Bowles) was interviewed. Information provided by the former facility manager has been incorporated into appropriate sections of this report.

2.6 PAST OWNERS, OPERATORS AND OCCUPANT INTERVIEWS

In accordance with ASTM Standard Practice E 1527-05, interviews with past owners, operators, and occupants shall be conducted to the extent that they have been identified and that the information likely to be obtained is not duplicative of information already obtained. The User did not provide Blackstone with contact information for past owners, operators, or occupants. As a result, interviews for such parties could not be performed during this Phase I ESA.

3.0 SITE DESCRIPTION

The site is located at 3050 Hempland Road in East Hempfield Township, Lancaster County, Pennsylvania. The YTI facility is located on the northern side of Hempland Road immediately south of US Route 30 and is approximately 500 feet east of Centerville Road. A Site Location Map, depicted on the U.S. Geological Survey (USGS) *Columbia East, Pennsylvania* topographic quadrangle, is included in Appendix A.

3.1 SITE CHARACTERISTICS AND FEATURES

Street Address: 3050 Hempland Road

City and State: East Hempfield Township, Pennsylvania

County: Lancaster County

Legal Description: Parcel Identification Numbers: 290-75820, 290-95687, and 290-08331

Tract No. 1: All that certain lot or tract of land situate on the north side of Hempland Road between Donnerville Road and Centerville Road in East Hempfield Township, Lancaster County, Pennsylvania, and being known as Lot No. 3, as shown on an Alta/ACSM Land Title Survey prepared by Saxinger and Black, Inc. Land Surveyors and Landscape Architects, bearing Job Number 05-337-03, dated September 1, 2005, and being more fully described in Document No. 5463452 in deed records of Lancaster County, Pennsylvania.

Tract No. 2: All that certain five (5) foot strip along the east edge of the larger tract from which this is taken, situate in the Township of East Hempfield, County of Lancaster and Commonwealth of Pennsylvania, being more fully described in Document No. 5463452 in deed records of Lancaster County, Pennsylvania.

Tract No. 3: All that certain lot or tract of land situate on the north side of Hempland Road, west of Centerville Road, in the Township of East Hempfield, County of Lancaster and Commonwealth of Pennsylvania, and being known as Lot No. 9, as shown on an Alta/ACSM Land Title Survey prepared by Saxinger and Black, Inc. Land Surveyors and Landscape Architects, bearing Job Number 05-337-03, dated September 1, 2005, and being more fully described in Document No. 5463452 in deed records of Lancaster County, Pennsylvania.

Owner: York Tech Associates, LP

Property Size: Approximately 7.1 acres

Zoning: GI: General Industrial

Site Use: The site is occupied by a technical school primarily providing instruction/training for culinary arts, criminal justice, and allied medical service careers. The building is comprised of classrooms, kitchen and restaurant areas, a dental training facility with X-ray equipment, a computer lab, an administrative office area, restrooms, and utility and maintenance storage rooms. The dental training facility consists of dental chairs and mannequins for educational purposes. A receiving area is located at the south side of the building. An exterior storage area is located at the southwest corner of the building.

Structure(s)	<i>Location On Site</i>	<i>Number of Stories</i>	<i>Years(s) Built</i>
<i>Educational building</i>	Center	1	1973

Construction Materials

Educational building Masonry (concrete block and brick) walls and corrugated metal ceilings with poured reinforced concrete foundation. The exterior walls are brick and the roof consists of a flat, rubber membrane system.

Other Site Features: Paved parking areas are located on the north, south, and east sides of the site building. Grassed areas are located further north of the north paved parking lot and on the west side of the site. Landscaping is present throughout the site. Access to the site from Hempland Road is via access drives on the south side of the site.

A Site Plan is included in Appendix A. Site photographs are provided in Appendix B.

3.2 UTILITIES

Electricity Provider: Pennsylvania Power & Light Company (PPL)

Natural Gas Provider: Columbia Gas of Pennsylvania

Potable Water: Lancaster City Water Bureau (LCWB)

Sewer Services: Lancaster Area Sewer Authority (LASA)

	<i>Findings</i>	<i>Sources of Findings</i>
On-Site Water Wells	None	Site inspection and site representatives
On-Site Septic Systems	Former septic system abandoned	Site representatives, local agencies

Heating/Cooling Systems: Heating, ventilation, and air conditioning (HVAC) at the site building is provided by natural gas-fired forced-air units located on the roof. Domestic hot water is provided to the building by electric hot water heaters located in isolated areas throughout the facility.

No physical evidence of water wells, septic systems, or on-site wastewater treatment was observed during the site visit except for those discussed in Section 8.6.

Based on documentation provided by LCWB representatives, drinking water supply service to the site was confirmed back to at least 1980. There are reportedly no records pre-dating 1980.

According to LASA representative, Ms. Melissa Paules, the site was connected to sanitary sewer service by permit dated August 27, 1974 and inspected/approved on September 4, 1974. Mr. Bowles stated that the site formerly had a septic system located at the west side of the site and when an addition to the west side was planned, the facility was required to connect to the LASA system. Based on this information, the septic system was in use for approximately one year prior to conversion to municipal sanitary sewer service. This former use of chlorinated solvents and potential discharge to the septic system is considered a REC as discussed in Section 8.6.

No RECs were identified as a result of the review of the site as described in this section of the report. No further investigation is recommended.

4.0 VICINITY RECONNAISSANCE

The site is located within East Hempfield Township, Lancaster County, Pennsylvania, within an area of primarily residential and commercial development. Adjoining property use is summarized as follows:

North: A hotel/motel facility and residential property beyond US Route 30;

South: A Purina Mills, Inc. pet food production facility and the Unclaimed Freight facility beyond Hempland Road;

East: Steinmetz Coins and Currency, Inc. facility and two professional office buildings; and

West: Thomas Somerville Company plumbing, heating, and air conditioning supplies distribution facility.

Source	Findings
Field observations	No industrial, manufacturing or military operations such as outdoor chemical or hazardous waste storage or handling activities that may impact the site were observed. No evidence of chemical spills, releases, or waste disposal was observed. No outdoor chemical or waste storage, wastewater treatment facilities, or other operations that may impact the site were identified on the adjoining properties via curbside view. No pits, ponds or lagoons for apparent discharge and/or treatment of process water were observed on the adjoining properties.
Environmental databases search (Section 7.0)	Several of the adjoining and nearby properties are listed in the databases, as further discussed in Section 7.0.

No RECs were identified as a result of the vicinity reconnaissance. No further investigation is recommended.

5.0 PHYSICAL SETTING

	<i>Findings</i>	<i>Sources of Findings</i>
Surficial Soils Beneath Site	Urban Land - consists of areas where more than 75 percent of the surface is covered by buildings and/or pavement. The soils in these areas have been so altered by cuts and fills for urban development that identification of these soils is not feasible.	EDR Report
Bedrock Identification	Stratified Sequence, Cambrian Series, Cambrian System, Paleozoic Era	EDR Report
Depth to Bedrock	Not provided	EDR Report
Topography	Site is relatively flat with a slight slope to the north and southeast. Topography for the area generally slopes southeast.	USGS <i>Columbia East, Pennsylvania</i> topographic map
Elevation	Approximately 440 feet amsl	USGS <i>Columbia East, Pennsylvania</i> topographic map
Depth to Shallow Groundwater	Approximately 20 feet bgs	EDR Report
Estimated Groundwater Flow Direction	Generally to the southeast	USGS <i>Columbia East, Pennsylvania</i> topographic map

bgs: below ground surface

amsl: above mean sea level

USGS: United States Geological Survey

EDR Report: Environmental Data Resources Database Report with Geocode (Inquiry No. 1841171.2s)

No RECs were identified as a result of the physical setting records review. No further investigation is recommended.

6.0 HISTORICAL INFORMATION REVIEW

As part of this Phase I ESA, historical information was reviewed to identify RECs or other conditions of environmental concern associated with the historical use of the site and surrounding properties. The historical information was obtained from interviews with site representatives and other individuals familiar with the site and reviews of aerial photographs, historical maps, and other *practically reviewable* standard historical sources which are considered *reasonably ascertainable*.

6.1 HISTORICAL FIRE INSURANCE MAPS

Environmental Data Resources, Inc. (EDR) conducted a search of available historical fire insurance maps for the site. Historical fire insurance maps are scaled drawings that indicate the location and use of building structures present in a given area from as early as the late 1800s. The maps provide information regarding the development and historical use of site structures and can indicate the historical presence of tanks at the site and other potential environmental concerns. No coverage for the site area was available from EDR. The Sanborn map search result is included in Appendix C.

6.2 AERIAL PHOTOGRAPHS

No aerial photographs of the site area were available from EDR. Aerial photographs of the site area dated 1940, 1956, 1971, 1988, 1993, and 1998 were reviewed at the Lancaster County Information Technology department in Lancaster, Pennsylvania. Copies of the 1940, 1971, 1988, and 1993 aerial photographs are contained in Appendix D. Review of the aerial photographs is summarized as follows:

Year	Aerial Photographs: Development/Land Uses				
	Site	Adjoining Properties			
		North	South	East	West
1940	Farmhouse, ancillary buildings, and agricultural land	Agricultural land and farm property	Agricultural land	Agricultural land and farm access drive	Agricultural land
1956	Similar to 1940 aerial photograph	Similar to 1940 aerial photograph	Similar to 1940 aerial photograph	Similar to 1940 aerial photograph	Similar to 1940 aerial photograph

Year	Aerial Photographs: Development/Land Uses				
	Site	Adjoining Properties			
		North	South	East	West
1971	Similar to 1956 aerial photograph except one ancillary building depicted	Farm property, agricultural land, and present day (hotel) structure beyond US Route 30	Agricultural land beyond Hempland Road	Similar to 1956 aerial photograph	Structure (present day distribution facility) at south side, parking lot at north side
1988	Present day structure in center, paved parking lot at north, south, and east sides	Similar to 1971 aerial photograph	Two structures (present day Purina and Unclaimed Freight facilities) beyond Hempland Road	Two structures (present day professional office)	Similar to 1971 aerial photograph except addition to north end of building
1993	Similar to 1988 aerial photograph	Similar to 1988 aerial photograph	Similar to 1988 aerial photograph	Similar to 1988 aerial photograph except third structure present (present day coin facility)	Similar to 1988 aerial photograph
1998	Similar to 1993 aerial photograph	Similar to 1993 aerial photograph	Similar to 1993 aerial photograph	Similar to 1993 aerial photograph	Similar to 1993 aerial photograph

Findings: No RECs were identified from the review of the aerial photographs.

6.3 HISTORICAL TOPOGRAPHIC MAPS

Historical topographic maps of the site area for the years 1904, 1943, 1956, 1969, 1976, 1983, and 1995 were obtained from EDR. The historical topographic maps, which were not reproducible, are summarized as follows:

Year	Development/Land Uses				
	Site	Adjoining Properties			
		North	South	East	West
1904	White shading (indicative of rural land) and one small structure	White shading	White shading	White shading	White shading

Year	Development/Land Uses				
	Site	Adjoining Properties			
		North	South	East	West
1943	Two structures and farm drive	Similar to 1904 topographic map except small structure depicted	Similar to 1904 topographic map	Similar to 1904 topographic map except farm drive depicted	Similar to 1904 topographic map
1956	Similar to 1943 topographic map	Similar to 1943 topographic map except three structures depicted	Similar to 1943 topographic map	Similar to 1943 topographic map	Similar to 1943 topographic map
1969	Similar to 1956 topographic map	Seven structures and access drive west of Centerville Road beyond US Route 30	White shading beyond Hempland Road	Similar to 1956 topographic map	Similar to 1956 topographic map
1976	Similar to 1969 topographic map	Similar to 1969 topographic map except large (present day motel) structure also depicted beyond US Route 30	Similar to 1969 topographic map	Structure and access drive intersect farm drive; access drives connected to Hempland Road	Structure (present day distribution facility) depicted
1983	Similar to 1976 topographic map	Similar to 1976 topographic map	Similar to 1976 topographic map	Similar to 1976 topographic map	Similar to 1976 topographic map
1995	Beige shading indicating developed area	Three structures and access drive west of Centerville Road, beige shading beyond US Route 30	Beige shading and access drives beyond Hempland Road	Beige shading	Beige shading

Findings: No RECs were identified from the review of the topographic maps.

6.4 AGENCY RECORDS, INTERVIEWS AND OTHER HISTORICAL SOURCES

<i>Source</i>	<i>Information Requested</i>	<i>Findings</i>
East Hempfield Township Zoning District Map	Zoning	Site, south, and west adjoining properties area zoned General Industrial (GI). North and east adjoining properties are zoned commercial.
Lancaster Public Library	Historic maps	Historic atlases dated 1864, 1875, and 1899 depicted the site as undeveloped rural land.
Lancaster County Assessment Office GIS Department	Aerial photographs	Aerial photographs dated 1940, 1956, 1971, 1988, 1993, and 1998 reviewed; copies obtained for 1940, 1971, 1988, and 1993.
Ms. Melissa Paules, LASA (717-291-4833 x10)	Site connection date to municipal sanitary sewer service	The permit for sanitary sewer service was dated August 27, 1974 and was approved September 4, 1974. Service has been provided since 1974.
Lancaster City Water Bureau representatives	Drinking water quality and drinking water service	Drinking water is in compliance with federal and state drinking water requirements. Documentation of drinking water supply service to the site was confirmed back to at least 1980. No records reportedly available pre-dating 1980.
Mr. Derek Jones, PPL Support Engineer, Pennsylvania Power & Light (PPL) Company, (717-560-2650)	Pad-mounted transformer fluid testing and former occupant	The transformer located on the site is owned by PPL. Testing of the transformer fluid in 1987 revealed a polychlorinated biphenyl (PCB) concentration of 0.10 parts per million (ppm). Therefore, the transformer is categorized as Non-PCB (less than 50 ppm). Site was formerly International Signal & Control industrial facility.
Lancaster Area Sewer Authority representative	Site connection date to municipal sanitary sewer	The site was connected to sanitary sewer service by permit dated August 27, 1974 and inspected/approved on September 4, 1974.
Mr. Joe Finn, Construction Code Official, East Hempfield Township Building Department, (717-898-3100)	Site compliance issues, violations, USTs, ASTs, or other environmental issues	No site compliance issues, violations, USTs, ASTs, or other environmental issues known for the site. Mr. Dave Lockard would be the contact for the septic system abandonment.
Mr. Dave Lockard (717-653-1008)	Site septic system	No record of any septic system was known or found for the site.

Findings: No RECs were identified as a result of the agency records review and interviews.

6.5 ENVIRONMENTAL LIEN SEARCH INFORMATION

Blackstone obtained independently an Environmental LienSearch Report (ELSR) from EDR. The ELSR includes results from a search of available current land title records for environmental cleanup liens and other activity and use limitations (AULs), such as engineering controls and institutional controls.

The search did not indicate evidence of an environmental lien on title of the site arising out of response actions, cleanup, or other remediation of hazardous substances or petroleum products on the site. The ELSR documentation is reproduced in Appendix E.

6.6 CITY DIRECTORIES

A search of city directories for the site and vicinity was performed by EDR, in approximate five year intervals. This review indicated that there was city directory coverage for the site and vicinity from 1961 through 2005. In addition, Blackstone reviewed available city directories at the Lancaster Public Library from 1966 through 2004. Based on review of the city directories, YTI was listed at the site address since 2003. The following listings were also indicated for the site address: Emtrol, Inc. (1996-2002); and International Signal & Control Corporation electronic manufacturer (1973-1992). No listings were found for the site from 1993 through 1995 or prior to 1973. Hempland Road was not listed prior to 1970.

The north adjoining property (beyond US Route 30) address (500 Centerville Road) was listed as a motel facility since at least 1970; this property is currently occupied by the Park Plaza Hotel. Commercial use of the south adjoining properties beyond Hempland Road has consisted of the present day Purina Mills, Inc. pet food production facility and the Unclaimed Freight Company facility since at least 1983 and 1981, respectively. Two present day professional office buildings (3002 and 3004 Hempland Road) have occupied the adjoining east property since at least 1990 and 1993, respectively. The west adjoining property (3140 Hempland Road) listings consisted of the following: the present day Thomas Somerville Company plumbing, heating and air conditioning supplies distribution facility (1997-2004); Novelty Manufacturing (1986-1996); ASM Industries, Inc. pumps and parts (1981-1983); and "Warehouse" (1975-1978).

6.7 PREVIOUS ENVIRONMENTAL REPORTS

Blackstone was provided with the following previous environmental reports regarding the site:

- *Phase I Environmental Assessment of York Technical Institute, 3050 Hempland Road, East Hempfield, Lancaster County, Pennsylvania 17601, prepared by Property Solutions, Inc. (Property Solutions), dated October 5, 2005 (Property Solutions Phase I EA Report) for Morgan Stanley Mortgage Capital, Inc. in New York, New York.*

The purpose of the Property Solutions Phase I Report was to determine if there was a likelihood of significant site contamination from either on- or off-site sources. Property Solutions summary of the previous and current use of the site at the time of their site reconnaissance is similar to the previous use and present day conditions documented by Blackstone. Property Solutions concluded that the Phase I Environmental Site Assessment, reportedly performed in conformance with the scope and limitations of ASTM Practice E 1527-00, revealed the following evidence of RECs in connection with past or present use of the site:

1. **Site Listings on Database:** The site was listed as a CERCLIS No Further Remedial Action Planned (NFRAP), CORRACTS, RCRA Small Quantity Generator (SQG), FINDS, and Leaking Underground Storage Tank (LUST) facility. Based on these listings, Property Solutions recommended file reviews for the CORRACTS listings at the USEPA and the LUST listing at the Pennsylvania Department of Environmental Protection (PADEP) and NFRAP.

In addition, Property Solutions identified the former ISC Defense Systems, Inc. RCRA SQG and FINDS listings and the presence of suspect ACM as “ASTM non-scope considerations.” Suspect ACM included vinyl floor tile with associated mastic, drywall and associated joint compound, and ceiling tiles. Property Solutions recommended implementation of an ACM Operations and Maintenance (O&M) Plan for the identified suspect ACM. RCRA SQG and FINDS listings are not a REC as discussed in Section 7.1. Suspect ACM associated with the site is not a REC as discussed in Section 8.11.

- *Pennsylvania DEP and the United States EPA File Review, York Technical Institute, 3050 Hempland Road, East Hempfield, Lancaster County, Pennsylvania 17601, prepared by Property Solutions, Inc. (Property Solutions), dated October 18, 2005*

(Property Solutions Regulatory File Review) for Morgan Stanley Mortgage Capital, Inc. in New York, New York.

The purpose of the Property Solutions Regulatory File Review was to evaluate the potential impact of database listings identified during the Property Solutions Phase I EA Report. The following summarizes review of the Property Solutions Regulatory File Review:

1. Tenants at the site included: International Signal and Control (ISC) Corporation, ISC Defense Systems, Inc., ISC Technologies, and Ferranti Technologies (electronics systems and modules manufacturing); and Emtrol, Inc. (design and manufacturing of custom industrial control equipment). These former tenant activities included use of solvents during production and vapor degreasing processes. Based on the waste codes (including F001, F002, and F003) indicated for the former electronics manufacturing activities, chlorinated solvents were formerly used at the site. The March 4, 1993 inspection of the site by Pennsylvania Department of Environmental Resources (PADEP) performed subsequent to cessation of the electronic manufacturing in February 1993 confirmed the absence of any hazardous wastes remaining at the site. In addition, weapon magazines were confirmed to be empty. Violations included a waste shipment without hazardous waste manifest, improper labeling of hazardous waste containers, and absence of a PADEP Preparedness, Prevention, and Contingency Plan. The violations were resolved/closed.
2. A former 6,000-gallon heating oil UST (registered as a 10,000-gallon and referred to as both a 6,000-gallon and 8,000-gallon UST) located within ten feet of the north side of the building was removed in October 1994. Evidence of a release was encountered during closure activities and a total of approximately 30 cubic yards of contaminated soil was excavated and stored on plastic. This contaminated soil was subsequently disposed under chain of custody procedures at an approved disposal facility. Soil samples collected from the excavation following removal of the impacted soil exhibited no detectable concentrations of total petroleum hydrocarbons (TPH) or benzene, toluene, ethylbenzene, or xylenes (BTEX).

Based on the removal of the former heating oil UST, proper disposal of impacted soils, and closed status with no further action required by PADEP, the former heating oil UST is not a REC.

The former manufacturing use of the site is further discussed below in Section 6.8

Excerpts of the previous reports and documents are provided in Appendix F.

6.8 HISTORICAL INFORMATION CONCLUSIONS

Reasonably ascertainable historical information indicates that the site consisted of undeveloped, residential, and/or agricultural land from at least 1864 until construction of the present-day structure in 1973. Previous uses of the site since 1973 included the following: International Signal & Control Corporation (ISC) electronic manufacturer (1973-1992); and Emtrol, Inc. (1996-2002). YTI has occupied the site since acquisition in 2003.

The former site use by ISC from approximately 1973-1993 represents an environmental concern based on the widely recognized use of solvents in the manufacturing and assembly of electronic components. Hazardous waste codes associated with past ISC operations, which include F001, F002, and F003, confirm the use of chlorinated solvents at the site. Documentation regarding past ISC operations and materials handling reviewed at the PADEP also indicate the use of two vapor degreasers in the ISC production lines. Standard vapor degreaser solvents include trichloroethylene (TCE), methylene chloride, and perchloroethylene (perc). These chlorinated solvents readily penetrate concrete floors and can impact underlying soil and groundwater. Based on the duration (20 years) of ISC operations, the recognized use of chlorinated solvents in the electronics manufacturing process, and the time period of operation during the 1970s and early 1980s which pre-dates various hazardous substance/waste reporting, handling, and disposal requirements, the former site use by ISC is considered a REC. Further investigation in the form of a subsurface soil and groundwater investigation is recommended to evaluate the potential impact from historical site activities.

The adjoining properties consisted of undeveloped, residential, and/or agricultural land from at least 1864 through circa 1970. One of the north adjoining properties (beyond US Route 30) has been a hotel/motel facility since at least 1970. The remaining north adjoining property has been used for agricultural/residential purposes since at least 1904. Commercial use of the south adjoining properties beyond Hempland Road has consisted of the Purina Mills, Inc. pet food production facility and the Unclaimed Freight Company facility since the early 1980s. Two present day professional office buildings have occupied the east adjoining properties since the early 1990s. The west adjoining property use consisted of the present day Thomas Somerville Company

plumbing, heating and air conditioning supplies distribution facility since 1997. Former occupants listed at this west adjoining property included: Novelty Manufacturing (1986-1996), ASM Industries, Inc. pumps and parts (1981-1983), and "Warehouse" (1975-1978).

No other RECs were identified based on the historical records search and no further investigation is recommended.

The historical information reviewed for the site did not confirm the first developed use of the site. *Data failure*, as defined by ASTM, has occurred in attempting to identify obvious uses of the site back to the first developed use, or back to 1940, whichever is earlier. Information regarding the use of the site prior to the late 1800s was not available from the *standard historical sources* (including available aerial photographs, fire insurance maps, property tax files, recorded land title records, USGS topographic maps, local street directories, building department records, or zoning/land use records). There were no other reasonably ascertainable historical sources available for review that were considered sufficiently useful. It is the opinion of Blackstone that the data failure does not represent a significant data gap that impacts our ability to identify RECs.

7.0 ENVIRONMENTAL DATABASE SEARCH AND REVIEW

Federal, State, local, tribal, and proprietary environmental databases were searched to determine the environmental regulatory status of the site, adjoining facilities, and facilities identified within the specified approximate minimum search distance (AMSD) of the site. This information was compiled by EDR. The distance from the site that each database is searched is established by ASTM Standard E 1527-05. The database search report, including the date and a detailed description of each database searched, is provided in Appendix G.

The results of the environmental database search, the Federal, State, local, tribal, and proprietary databases searched, and the search distances specified for each database are summarized as follows:

7.1 FEDERAL, STATE, LOCAL, TRIBAL AND PROPRIETARY DATABASES

The following databases were reviewed by Blackstone:

<i>Federal Databases</i>	<i>Search Distance</i>
National Priorities List (NPL)	1.0 mile
Proposed NPL	1.0 mile
Delisted NPL: National Priority List Deletions	0.5 mile
Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS)	0.5 mile
No Further Remedial Action Planned Sites (NFRAP)	0.5 mile
Resource Conservation and Recovery Act (RCRA) - Corrective Action Sites (CORRACTS)	1.0 mile
RCRA - Treatment, Storage and Disposal (TSD) Facilities	0.5 mile
RCRA - Large-Quantity Generators (LQGs)	Site and adjoining
RCRA - Small-Quantity Generators (SQGs)	Site and adjoining
ERNS - Emergency Response Notification System	Site only
US ENG CONTROLS - Engineering Controls Site List	0.5 mile
US INST CONTROL - Sites with Institutional Controls	0.5 mile
US BROWNFIELDS - Listing of Brownfield Sites	0.5 mile
CONSENT: Superfund (CERCLA) Consent Decrees	1.0 mile
ROD: Records of Decision	1.0 mile
FINDS: Facility Index System/Facility Identification Initiative Program Summary	Site only
HMIRS: Hazardous Materials Information Reporting System	Site only
MLTS: Material Licensing Tracking System	Site only
MINES: Mines Master Index File	0.25 mile
NPL Liens: Federal Superfund Liens	Site only

<i>Federal Databases</i>	<i>Search Distance</i>
PADS: PCB (Polychlorinated Biphenyl) Activity Database System	Site only
ODI: Open Dump Inventory	0.5 mile
UMTRA: Uranium Mill Tailings Sites	0.5 mile
FUDS: Formerly Used Defense Sites	1.0 mile
DOD: Department of Defense Sites	1.0 mile
RAATS: RCRA Administrative Action Tracking System	Site only
TRIS: Toxic Chemical Release Inventory System	Site only
TSCA: Toxic Substances Control Act	Site only
SSTS: Section 7 Tracking System	Site only
FTTS: Federal Insecticide, Fungicide & Rodenticide Act (FIFRA)/TSCA Tracking System	Site only
ICIS: Integrated Compliance Information System	Site only

<i>State/County Databases</i>	<i>Search Distance</i>
SHWS: Hazardous Sites Cleanup Act Site List	1.0 mile
HSCA: HSCA Remedial Sites Lists	1.0 mile
SWF/LF: Solid Waste Information System	0.5 mile
HIST LF: Abandoned Landfill Inventory	0.5 mile
HIST LF INACTIVE: Inactive Facilities List	0.5 mile
HIST LF INVENTORY: Facility Inventory	0.5 mile
LUST: Leaking Underground Storage Tank Release Sites	0.5 mile
UNREG LTANKS: Unregulated Tank Cases	0.5 mile
UST: Active Underground Storage Tank Facilities	0.25 mile
ARCHIVE UST: Archived UST Sites	0.25 mile
LAST: Leaking Aboveground Storage Tank Release Sites	0.5 mile
AST: Pennsylvania Registered ASTs	Site only
ARCHIVE AST: Archived AST Sites	Site only
MANIFEST: Manifest Information	0.25 mile
ACT 2-DEED: Act 2 Deed Acknowledgement Sites	0.5 mile
ENG CONTROLS: Engineering Controls Site Listing	0.5 mile
INST CONTROLS: Institutional Controls Site Listing	0.5 mile
VCP: Voluntary Cleanup Program Sites	0.5 mile
DRYCLEANERS: Drycleaner Facility Locations	0.25 mile
BROWNFIELDS: Brownfields Sites	0.5 mile
AIRS: Permit and Emission Inventory Data	Site only

<i>Tribal Records</i>	<i>Search Distance</i>
INDIAN RESERV: Indian Reservations	1.0 mile
INDIAN LUST: Leaking Underground Storage Tanks on Indian Land	0.5 mile
INDIAN UST Database	Site and adjoining

<i>EDR Proprietary Databases</i>	<i>Search Distance</i>
Manufactured Gas Plants	1.0 mile

The results of the database search are summarized as follows:

SITE:

The site is identified as a CERCLIS NFRAP, CORRACTS, RCRA SQG, FINDS, and LUST facility in the database report prepared by EDR. The CERCLIS NFRAP listing (Site ID 0303482) provides the following actions: site discovery on September 9, 1988; preliminary assessment on July 14, 1989; and archive site on January 23, 1996. The CORRACTS information indicates that the listing applied to the entire facility and that the site was assigned a low corrective action priority on December 1, 1991. As discussed in Section 6.7, the various database listings are not a REC as they are associated with administrative filings which has seen been corrected. However, the site use as an electronic components manufacturing facility from 1973 through 1993 is a REC.

The site (Ferrauti Tech) LUST listing indicates a petroleum UST with a release discovered on August 5, 1989 with an inactive status assigned on April 6, 1999. This listing was previously discussed in Section 6.7, and is not considered a REC.

The RCRA SQG listing indicates the existence of three violations at the site. These consisted of: Generator Pre-Transport Requirements (determined July 7, 1997, compliance achieved July 28, 1997); TSD-Other Requirements (Oversight) (determined January 26, 1989, compliance achieved January 26, 1991); and TSD-Other Requirements (Oversight) (determined October 29, 1986, compliance achieved October 19, 1986). Based on the compliant status of the former RCRA SQG violations and absence of present day listings for the site, the RCRA SQG listing is not considered a REC. The FINDS database is a cross-reference database and based on the nature of the FINDS database, the FINDS listing is not a REC.

ADJOINING OR FACILITIES IN CLOSE PROXIMITY:

Adjoining property database listings consist of one RCRA SQG and FINDS facility. The west adjoining Novelty Flower Planter Manufacturing facility at 3140 Hempland Road is listed as a RCRA SQG and FINDS facilities. Review of the database details and the USEPA RCRAInfo and Enforcement and Compliance History Online (ECHO) websites revealed no violations. Based on the absence of violations, this west adjoining RCRA SQG listing is not considered a REC. The FINDS database is a cross-reference database and based on the nature of the FINDS database, the FINDS listing is not a REC.

NON-ADJOINING FACILITIES WITHIN APPROXIMATE MINIMUM SEARCH DISTANCE:

As detailed in the EDR Report, several facilities on various databases are located within the ASTM E 1527-05 Approximate Minimum Search Distance (AMSD). Based on factors such as distance to the site, topography, media affected (soil, groundwater, or air), depth to groundwater, anticipated groundwater flow direction away from the site, and a "Cleanup Completed" regulatory status, these non-adjoining facilities within the AMSD are unlikely to impact the site and are not considered RECs.

7.2 UNMAPPABLE FACILITIES

Due to inadequate address information or other erroneous facility information, several facilities listed in the environmental databases searched could not be plotted by EDR on a radius map. However, these facilities are still identified in the EDR report by grouping

them into an unmappable facility summary. This summary was reviewed by Blackstone to determine if any of the facilities included on this list are located at, adjoining to the site, or within the respective search distances. The results of the review of the unmappable facility summary are summarized as follows:

SITE:

Not listed

ADJOINING FACILITIES:

None listed

OTHER FACILITIES:

A total of two VCP orphan facilities are determined to be within the respective search distances of the site. These VCP listings are both associated with the 257 Centerville Road Turkey Hill convenience store located approximately 0.20 mile southeast and downgradient of the site. Based on the distance from the site and downgradient location, this VCP facility is not considered a REC.

No facilities listed on the Unmappable site summary are located on or adjoining the site.

7.3 AFFIRMATION

Blackstone's conclusions based on the EDR report are limited to the accuracy of that report. To the extent possible, field observations are used by Blackstone to verify the information or identify errors and inconsistencies in the search report regarding the listed facilities in the immediate vicinity of the site. The database reviewed is sufficiently complete and current to be used as a source to satisfy the regulatory database requirements outlined in the Scope of Work.

7.4 ENVIRONMENTAL DATABASE SEARCH AND REVIEW CONCLUSIONS

The historic site use as an electronic components manufacturing facility from 1973 through 1993 is a REC. Further investigation is recommended.

8.0 SITE INSPECTION

Name of Inspector: Jeff Mt. Pleasant

Date of Site Inspection: January 29, 2007

SITE REPRESENTATIVES		
<i>Name</i>	<i>Title or Association with Site</i>	<i>Years Associated with Site</i>
Mr. Earl Ludwig	YTI Facility Manager – Lancaster Campus	7 years
Mr. Howard Bowles	YTI Chief Director of Facilities	11 years

The site inspection consisted of a walkover of the site perimeter and exterior site areas and a walk-through of the building including the classrooms, kitchen and restaurant areas, the dental training facility, the computer lab, restrooms, and utility and maintenance storage rooms. The adjoining properties were visually observed from curbside without being entered.

8.1 CHEMICALS AND MATERIALS USAGE

<i>Chemical or Material</i>	<i>Use</i>	<i>Container Type</i>	<i>Storage Location</i>
Paint, caulk, adhesives, gasoline, lubricants, refrigerants for air conditioners, and general household cleaning supplies	General maintenance	5-gallon or smaller	Maintenance shop and storage areas

Information Source	Findings
Field observations	No physical evidence of spills or releases observed.
Site representatives	No spills or releases of chemicals or materials requiring emergency response and/or agency notification have occurred
Records review	As previously discussed in Section 7.1

8.2 UNDERGROUND STORAGE TANKS (USTS)

<i>Number of USTs</i>	<i>Capacity (gallons)</i>	<i>Contents</i>	<i>Location</i>	<i>Status/Notes</i>
None				

Information Source	Findings
Field observations	No physical evidence of current or former USTs was observed
Site representatives	Unaware of any current or former USTs
Records review	As previously discussed in Section 6.7
State UST or LUST databases	As previously discussed in Section 6.7

The site listing as a LUST facility is not a REC as discussed in Section 6.7.

8.3 ABOVEGROUND STORAGE TANKS (ASTS)

<i>Number of ASTs</i>	<i>Capacity (gallons)</i>	<i>Contents</i>	<i>Location</i>	<i>Status/Notes</i>
None				

Information Source	Findings
Field observations	No physical evidence of current or former ASTs
Site representatives	Unaware of any current or former ASTs
Records review	No records of the installation or removal of ASTs

8.4 HAZARDOUS WASTES

<i>Hazardous Waste</i>	<i>Generated By</i>	<i>Storage Container</i>	<i>Storage Location</i>	<i>Disposal Details</i>	<i>Status/Notes</i>
X-ray fixer	Dental training lab	1-gallon container	X-ray room	Not yet disposed of	X-ray fixer used infrequently, starting in October 2006
Lead foil packets	Dental training lab		X-ray room	Not yet disposed of	Used infrequently, starting in October 2006

Information Source	Findings
Field observations	No physical evidence of on-site hazardous waste disposal other than x-ray fixer.
Site representatives	The site is a RCRA SQG facility.
RCRA databases	The site is listed as a RCRA SQG facility.

Waste handling and storage practices appeared to be good, with no evidence of spills or releases of hazardous wastes noted. The generation of hazardous wastes at the site, and

the site listing as a RCRA SQG facility as confirmed in a review of the USEPA's RCRAInfo and ECHO websites is not a REC as discussed in Section 7.1.

8.5 NON-HAZARDOUS WASTES

<i>Non-Hazardous Waste</i>	<i>Generated By</i>	<i>Storage Container</i>	<i>Storage Location</i>	<i>Disposal Details</i>	<i>Status/Notes</i>
General refuse	YTI activities	Dumpsters	Various locations throughout the site	Removed regularly for off-site disposal by contract disposal firm	Not a REC
Cooking grease	YTI culinary school activities	55-gallon drums	Fenced dumpster area	Removed weekly by Waste Management, Inc.	
Used needles	Dental school activities	Plastic sharps containers	Dental office area	Removed periodically by Stericycle	

Information Source	Findings
Field observations	No physical evidence of landfilling
Site representatives	Unaware of any landfilling

8.6 WASTEWATER AND STORM WATER DISCHARGES

Wastewater Discharges				
<i>Type</i>	<i>Generated By</i>	<i>Discharged To</i>	<i>REC</i>	<i>Status/Notes</i>
Sanitary	YTI operations	Municipal sewer system	No	Former septic system reportedly abandoned; site reportedly hooked up to municipal sanitary sewer in 1974.
Sanitary	Culinary school activities	Grease trap system	No	Grease trap system consists of a three-chambered tank system that is periodically pumped out every two months by Klines; system is also water jetted twice per year

Storm Water Discharges				
<i>Discharged From</i>	<i>Discharged To</i>	<i>Potential Impacts</i>	<i>REC</i>	<i>Status/Notes</i>
Roof through roof drains	Stormwater drainage basin	None	No	Discharge directed to on-site storm drains, and then to stormwater drainage basin at east side of site
Exterior site surfaces	On site storm drain drop inlets	None	No	Discharge directed to on-site storm drains, and then to stormwater drainage basin at east side of site

According to LASA representative, Ms. Melissa Paules, the site was connected to sanitary sewer service by permit dated August 27, 1974 and inspected/approved on September 4, 1974. Mr. Bowles stated that the site formerly had a septic system located at the west side of the site and when an addition to the west side was planned, the facility was required to connect to the LASA system. Based on this information, the septic system was in use for approximately one year prior to conversion to municipal sanitary sewer service. Based on the confirmed use of chlorinated solvents since construction in 1973, the potential for impact to the former septic system exists. Therefore, the former use of chlorinated solvents and potential discharge to the septic system is considered a REC.

8.7 POLYCHLORINATED BIPHENYLS (PCBS)

PCBs can be present in coolants or lubricating oils used in older electrical transformers, hydraulic systems, and other similar equipment. The 1976 Toxic Substances Control Act (TSCA) extended regulatory control over the use of PCBs to the USEPA. In November 1979, the USEPA generally prohibited the domestic manufacture of PCBs in electromagnets, transformers, and heat-transfer and hydraulic equipment.

<i>Equipment</i>	<i>Location</i>	<i>Owner</i>	<i>Condition</i>	<i>Labeling</i>	<i>Evidence of Spills or Releases</i>
Pad-mounted unit	South side of building	PPL	Good	None	None

The transformer is owned and maintained by PPL and was observed in good condition, with no evidence of fluid release. Based upon an interview with Mr. Derek Jones of PPL, testing of the transformer fluid revealed a polychlorinated biphenyl (PCB) concentration of 0.10 parts per million (ppm). Therefore, the transformer is categorized

as Non-PCB (less than 50 ppm). Should fluid spills or releases from the electrical transformer occur, associated remediation efforts are typically the responsibility of the transformer owner (PPL) per Federal regulation (40 CFR 761.125.) Based on the good condition of the transformer and the reported absence of PCBs, the transformer is not a REC and no further investigation is recommended.

8.8 PONDS, PITS, AND LAGOONS

<i>Type</i>	<i>Contents</i>	<i>Location</i>	<i>REC</i>	<i>Status/Notes</i>
None				

Information Source	Findings
Field observations	No pits, ponds or lagoons were observed at the site
Site representatives	Unaware of any current or former pits, ponds or lagoons for process water discharges.
Records Review	Not listed

8.9 UNDERGROUND PIPELINES

<i>Type</i>	<i>Contents</i>	<i>Location</i>	<i>REC</i>	<i>Status/Notes</i>
None				

Information Source	Findings
Field observations	No underground pipelines or easements were observed on site. Evidence of underground pipeline transmission easements on the site carrying natural gas, liquid petroleum product, or other hazardous substances was not revealed during the regulatory records search.
Site representatives	Unaware of any current or former underground pipelines or easements
Records Review	No records of the installation or removal of underground pipelines

8.10 AIR EMISSIONS

<i>Emissions Source</i>	<i>Discharged To</i>	<i>Potential Impacts</i>	<i>REC</i>	<i>Status/Notes</i>
None				

8.11 ASBESTOS-CONTAINING MATERIALS (ACM)

Frequently-encountered types of ACM used in building construction include floor tile and mastic, spray-applied fireproofing, acoustical/decorative ceiling plaster, wallboard and joint compound, insulation, and many other building materials in common use prior to 1981. Materials which contain over one percent asbestos fibers are considered regulated ACM and must be handled according to USEPA and Occupational Safety and Health Administration (OSHA) regulations.

Blackstone conducted a limited visual survey for the presence of typically suspect ACM at the site. Suspect ACM identified by Blackstone at the time of the site inspection included vinyl floor tile and associated mastic, covebase with associated adhesive, drywall system (drywall wallboard and drywall joint compound), ceiling tiles, and fireproofing materials.

Based on the complete renovation date of the site building except for the administrative area (2003) and scope of work, bulk samples of suspect ACM were not collected. Based on the original construction date of the building (1973), suspect ACM exists in the administrative area. An asbestos Operations and Maintenance (O&M) Plan is recommended to address the suspect ACM.

Prior to demolition or renovation activities at the site, building materials must be handled in accordance with the National Emissions Standards for Hazardous Air Pollutants (NESHAPs), OSHA, and State of Pennsylvania regulations. The limited asbestos visual survey summarized in this Phase I ESA should not be considered an asbestos survey for demolition or renovation purposes.

8.12 LEAD-BASED PAINT (LBP)

Considering the building was developed prior to the recognized 1978 LBP determination date, the potential for LBP exists. However, complete renovation of the site building except for the administrative area was reportedly performed in 2003. In addition, the administrative area was reportedly recently painted and all surfaces were intact and in good condition. Therefore, no original painted surfaces are exposed and no LBP exposure issues are likely. Based on the renovation date, good condition of the painted surfaces, and non-residential use of the site, no sampling was performed and no further evaluation of LBP is recommended.

8.13 RADON GAS

A review of records regarding radon concentrations in Lancaster County, Pennsylvania was conducted to determine if concentrations of radon in the general area of the site are within the USEPA guidelines. The USEPA uses a continuous exposure level of greater than 4.0 pCi/L (picoCuries per liter of air) as a guidance level at which further evaluation and potential remedial action are recommended.

According to USEPA Office of Radiation and Indoor Air information/mapping, the site is located within a Radon Zone Level 1. The Radon Zone 1 has a predicted average indoor radon gas screening level of greater than 4.0 pCi/L, which is above USEPA guidance levels. Based on the non-residential use of the site, no radon testing was performed and no further evaluation of radon gas is recommended.

8.14 WETLANDS AND FLOOD HAZARD POTENTIAL

As defined by the USEPA and U.S. Army Corps of Engineers (USACE), wetlands are "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions."

Wetlands possess three essential characteristics: (1) hydrophytic vegetation; (2) hydric soils; and (3) hydrology. All three characteristics must be prevalent to document an area as a jurisdictional wetland.

Wetlands	
<i>Information Source</i>	<i>Findings</i>
National Wetland Inventory (NWI) map for the site area (<i>Columbia East, Pennsylvania</i>)	No mapped Federal wetland areas located at the site.
Field observations	No vegetation or ponded areas which are generally characteristic of wetlands were observed at the site.

Flood Hazard Potential	
<i>Information Source</i>	<i>Findings</i>
EDR Report, FEMA Flood Plain panel 420548 0010B	No flood areas are located within one-quarter mile of the site.

Based on wetland and floodplain sources researched, the site is not located in wetlands or floodplain areas. No further investigation is recommended.

8.15 LEAD IN DRINKING WATER

The site is provided with water by the Lancaster City Water Bureau (LCWB). Based on information obtained from the LCWB, the municipal water system reportedly meets the requirements as established by the USEPA, state, and local authorities for lead content in drinking water. Based on this information, no further investigation is recommended.

9.0 CONCLUSIONS AND RECOMMENDATIONS

Blackstone has performed a Phase I ESA of the site in general accordance with ASTM Standard E 1527-05 and the January 2, 2007 proposal (Agreement) between CMS and Blackstone. Based on the information obtained during the completion of this Phase I ESA, no RECs or other conditions of environmental were identified in connection with the site except for the following:

- **Former Manufacturing on Site:** The former site use by ISC from approximately 1973-1993 represents an environmental concern based on the widely recognized use of solvents in the manufacturing and assembly of electronic components. Hazardous waste codes associated with past ISC operations, which include F001, F002, and F003, confirm the use of chlorinated solvents at the site. Documentation regarding past ISC operations and materials handling reviewed at the PADEP also indicate the use of two vapor degreasers in the ISC production lines. Standard vapor degreaser solvents include trichloroethylene (TCE), methylene chloride, and perchloroethylene (perc). These chlorinated solvents readily penetrate concrete floors and can impact underlying soil and groundwater. Based on the duration (20 years) of ISC operations, the recognized use of chlorinated solvents in the electronics manufacturing process, and the time period of operation during the 1970s and early 1980s which pre-dates various hazardous substance/waste reporting, handling, and disposal requirements, the former site use by ISC is considered a REC.

Furthermore, Mr. Howard Bowles (Chief Director of Facilities for YTI) stated that a septic system located along the western side of the site was used when the facility was first constructed in 1973. When the addition along the western side of the building was constructed in 1974, the site was required to connect to the Lancaster Area Sewer Authority (LASA) system. According to LASA customer service representatives, the site was connected to sanitary sewer service by permit dated August 27, 1974 and inspected/approved on September 4, 1974. Based on this information, the septic system was in use for approximately one year prior to connection to municipal sanitary sewer service. Based on the confirmed use of chlorinated solvents since construction in 1973, the potential to subsurface impact via the former septic system also exists and is considered a REC.

Further investigation in the form of a subsurface soil and groundwater investigation is recommended to evaluate the potential impact from historical site activities.

The following asset management issue was identified at the site:

- **Asbestos-Containing Materials (ACM):** Based on the complete renovation date of the site building except for the administrative area (2003) and scope of work, bulk samples of suspect ACM were not collected. Based on the original construction date of the building (1973), suspect ACM exists in the administrative area. An asbestos Operations and Maintenance (O&M) Plan is recommended to address the suspect ACM.

Prior to demolition or renovation activities at the site, building materials must be handled in accordance with the National Emissions Standards for Hazardous Air Pollutants (NESHAPs), OSHA, and State of Pennsylvania regulations. The limited asbestos visual survey summarized in this Phase I ESA should not be considered an asbestos survey for demolition or renovation purposes.

10.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

This Phase I Environmental Site Assessment (ESA) Report documents the research methodology used by qualified environmental professionals of Blackstone to identify recognized environmental conditions using the scope and limitations of ASTM Standard E 1527-05 and the Agreement between CMS and Blackstone, dated January 2, 2007.

We declare that, to the best of our professional knowledge and belief, we meet the definition of *Environmental professional* as defined in §312.10 of 40 CFR 312, and we have the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the site. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

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